



Warner Norcross + Judd LLP

DECLASSIFIED

Date: 12/10/19 Initial: CB

April 1, 2019

Ms. Clara Beitin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 17th Floor  
New York, NY 10007-1866

Re: Kaydon Acquisition XI, Inc. Response to Section 104e Information Request

Dear Ms. Beitin:

Enclosed please find the written response of Kaydon Acquisition XI, Inc. to US EPA Region 3's Request for Information dated March 13, 2019.

If you have any questions or concerns regarding this response, please do not hesitate to contact me.

Sincerely,

Steven C. Kohl

SCK/sck  
Enclosures

cc: Marissa Mattingly  
Jane K. Webber, Esq.  
w/enclosures



**Kaydon Acquisition XI, Inc.'s Response to**  
**US EPA §104e Request for Information of March 13, 2019**

Below are Kaydon Acquisition XI, Inc.'s responses to the referenced Request for Information served upon legal counsel for Kaydon on matters relating to the MC Canfield Site in Newark, New Jersey.

**KAYDON ACQUISITION XI, INC.'S ASSERTION OF CONFIDENTIALITY OF DOCUMENTS  
PRODUCED**

The documents being produced contain financial information related to Kaydon Acquisition XI, Inc.'s conduct of the "Canfield Technologies" business. The information includes detailed information relative to the business' operation. As previously disclosed in prior 104e responses, the assets of the business were sold to a private unrelated entity in 2015 and the public disclosure of the financial contained in the produced documents could provide competitors of the business with information that could provide competitors with an unfair competitive advantage even though some of the information is several years old. The documents produced are not and were not generally available to employees of Kaydon Acquisition XI, Inc. or employees of any affiliated company and access was limited to employees and management personnel with a business need to know the information contained therein. Accordingly, Kaydon Acquisition XI, Inc. requests the documents produced be treated as confidential business information under applicable law for ten years from the date of this production.

**KAYDON ACQUISITION XI, INC.'S RESPONSES TO US EPA'S ENUMERATED REQUEST FOR  
INFORMATION**

1. Describe the dividend that Kaydon Acquisition XI, Inc. paid to Kaydon Corporation following the August 2015 sale of Kaydon Acquisitions XI, Inc.'s assets. Please state the amount, the date, and the reason for the dividend. Please also describe the composition of the assets that Kaydon Acquisition XI, Inc. transferred to Kaydon Corporation through the dividend. Business.

**Response:**

Provided as Attachment 1 to this response is a copy of the Closing Trial Balance for Kaydon Acquisition XI, Inc. (aka Canfield) as of August 31, 2015 reflecting a declared dividend of 34,589,367.30. The declared dividend consisted of cash and inter-company account adjustments and reconciliations. As Kaydon Acquisition XI, Inc. has sold its business in August of 2015 and intended to wind up its affairs, the dividend was declared for the reason of transferring the remaining assets for the company to its shareholder, Kaydon Corporation.

2. Please Provide copies of all documents related to the 2015 dividend that Kayson Acquisition XI, Inc. paid to Kaydon Corporation following the August 2015 sale of Kaydon Acquisition CI, Inc.'s assets, including any agreements, Board of Director Meeting Minutes, Board of Director Resolutions and any other documents related to or effectuating the dividend.

**Response:**

As of the date of this response, the identified document or record responsive to this request is Attachment 1

**CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION**

M.C. Canfield Superfund Site, Newark, New Jersey

State of Pennsylvania

County of Montgomery

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

Jane K. Webber

NAME (print or type)

Assistant Secretary

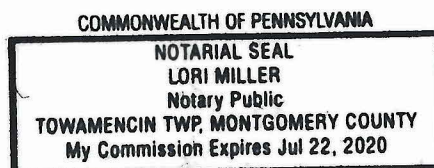
TITLE (print or type)

  
SIGNATURE

Sworn to before me this  
day of March 29, 2019

Notary Public 

18328927



# **Attachment 1**

Canfield Technologies  
8/31/15

Local ERP provided by Kevin Kwapis on 9/3/2015

Account No.	Description	Local ERP	Sale transaction	Ending Bal	
11012	CASH - GENERAL CHECKING - CITIBANK	(109,995.34)		(109,995.34)	
11193	INTERCOMPANY - KAYDON	21,263,138.30	(21,263,138.30)	0.00	Interco Balance with Compnay 9310
12100	ACCOUNTS RECEIVABLE - TRADE	1,617,757.22		1,617,757.22	Beg 21,263,138.30
12900	RESERVE FOR DOUBTFUL ACCOUNTS	(14,439.51)		(14,439.51)	Tax Liab transferred (2,108,824.00)
13100	INVENTORIES - RAW MATERIAL	396,785.51		396,785.51	Tax Exp on sale (7,098,515.00)
13110	RAW MATERIAL IN TRANSIT	286,084.00		286,084.00	12,055,799.30
13401	FG - MATERIAL	282,238.05		282,238.05	
13402	FG - LABOR	2,502.65		2,502.65	Cash from Sale 22,533,568.00
13403	FG - BURDEN	21,487.26		21,487.26	Dividend Paid 34,589,367.30
13441	In-Transit Material	47,968.30		47,968.30	
13442	In-Transit Labor	774.83		774.83	
13443	In-Transit Burden	6,624.51		6,624.51	
13502	FULL ABSORPTION - LABOR	11,152.89		11,152.89	
13820	INVENTORY RESERVES - FINISHED GOODS	(16,902.96)		(16,902.96)	
14310	PREPAID PROPERTY TAXES	13,156.66		13,156.66	
14500	DEFERRED FEDERAL INC.TAX - CURRENT	(22,265.00)	22,265.00	0.00	
14900	PREPAID EXPENSES	10,113.25		10,113.25	
14999	PREPAID OTHER	20,337.09		20,337.09	
17110	LAND	175,000.00		175,000.00	
17130	BUILDINGS	1,039,289.09		1,039,289.09	
17145	COMPUTERS	15,697.94		15,697.94	
17150	MACHINERY & EQUIPMENT	327,680.81		327,680.81	
17170	FURNITURE & FIXTURES	5,813.26		5,813.26	
17530	DEPRECIATION BUILDINGS	(93,296.52)		(93,296.52)	
17545	DEPRECIATION COMPUTERS	(14,733.50)		(14,733.50)	
17550	DEPRECIATION MACHINERY & EQUIP.	(224,154.21)		(224,154.21)	
17570	DEPRECIATION FURNITURE & FIXTURES	(2,960.75)		(2,960.75)	
18700	DEFERRED TAX ASSET	(683,990.00)	683,990.00	0.00	
21205	UN-AUDITED VOUCHERS (VOUCHERS PAYABLE)	(236,564.76)		(236,564.76)	
21210	ACCOUNTS PAYABLE - TRADE	(396,009.90)		(396,009.90)	
21220	ACCOUNTS PAYABLE - OTHER	(292,316.51)		(292,316.51)	
21310	FEDERAL INCOME TAXES	(1,843.62)		(1,843.62)	
21430	UNION DUES	32.50		32.50	
21499	UNION EE PR DEDUCTION	236.91		236.91	
22010	ACCRUED PAYROLL	(17,978.66)		(17,978.66)	
22040	ACCRUED VACATION PAY	(58,257.70)		(58,257.70)	
23010	ACCRUED COMMISSIONS	(12,555.14)		(12,555.14)	
23030	ACCRUED BONUS	(26,591.38)		(26,591.38)	
23040	ACCRUED STVS	(18,750.00)		(18,750.00)	
23050	ACCRUED PRODUCTION BONUS	(1,556.51)		(1,556.51)	
23110	ACCRUED REBATES	(20,559.73)		(20,559.73)	
23150	DEPOSITS OWED	(8,307.87)		(8,307.87)	
24200	FEDERAL INCOME TAX PAYABLE	(932,703.83)	932,704.00	0.17	
24210	STATE INCOME TAX PAYABLE	(469,864.94)	469,865.00	0.06	
29120	PAID IN CAPITAL	(19,559,598.00)		(19,559,598.00)	
29130	RETAINED EARNINGS	(925,992.76)		(925,992.76)	
	Current Yr Income	(1,381,681.93)	(15,435,053.00)	(16,816,734.93)	(37,302,325.69)
29135	DIVIDENDS DECLARED		34,589,367.30	34,589,367.30	(22,533,568.00)
		0.00	0.00	0.00	(2,712,958.39)
					12,055,799.30
					(9,207,339.00)
30100	GROSS SALES TO CUSTOMERS	(9,809,628.26)		(9,809,628.26)	

30600	SALES - REBATES	73,825.39	73,825.39
31100	SALES - R & A - MATERIAL	156,558.11	156,558.11
31110	SALES - PRICE ADJ	227.22	227.22
33100	SALES - CASH DISCOUNTS	121,908.34	121,908.34
41000	STANDARD MATERIAL COSTS	5,277,222.62	5,277,222.62
42100	STANDARD LABOR COST - CUSTOMER	72,528.77	72,528.77
43100	STANDARD COST OF BURDEN - CUSTOMER	618,840.94	618,840.94
46110	PURCHASE DISCOUNTS	(6,253.36)	(6,253.36)
46120	PURCHASE PRICE VARIANCE	0.43	0.43
48300	Symix Generated Inv Adjustments	(10,861.94)	(10,861.94)
49300	INVENTORY DROSS LOSS / RESERVES	38,855.37	38,855.37
49345	FULL ABSORPTION - LABOR	612.00	612.00
51100	DIRECT LABOR	64,956.60	64,956.60
51110	BURDEN APPLIED	(604,951.87)	(604,951.87)
51115	DIRECT LABOR - OT	798.90	798.90
51117	DIRECT LABOR - VACATION	13,137.60	13,137.60
51118	DIRECT LABOR - HOLIDAY	6,137.20	6,137.20
51119	DIRECT LABOR - SICK PAY	1,989.20	1,989.20
51150	INDIRECT LABOR	16,552.33	16,552.33
51157	INDIRECT LABOR - VACATION	1,324.40	1,324.40
51158	INDIRECT LABOR - HOLIDAY	726.15	726.15
51159	INDIRECT LABOR - SICK PAY	120.40	120.40
51160	INDIRECT LABOR - SALARIED	132,477.37	132,477.37
51165	IND LABOR - SALARIED OT	316.63	316.63
51400	PRODUCTIVITY - BONUS	1,556.51	1,556.51
51515	SALARIES LAB	21,898.73	21,898.73
51520	SALARIES - OFFICERS	60,404.17	60,404.17
51522	SALARIES DATA - PROCESSING	21,907.32	21,907.32
51523	SALARIES - ACCOUNTING	34,304.83	34,304.83
51525	SALARIES - SALES OFFICE	124,179.56	124,179.56
51610	FICA TAX PRODUCTION	11,666.64	11,666.64
51611	PAYROLL TAXES ( SUI, FUI )	3,501.73	3,501.73
51612	MEDICAL & LIFE INS - UNION	66,435.40	66,435.40
51617	FICA TAX INDIRECT LABOR	1,377.48	1,377.48
51618	PAYROLL TAXES ( SUI, FUI ) IND LABOR	408.70	408.70
51620	FICA TAX	35,703.22	35,703.22
51621	PAYROLL TAXES ( SUI, FUI )	6,669.25	6,669.25
51622	MEDICAL & LIFE INS - SALARIED	65,126.39	65,126.39
51623	INCENTIVE COMPENSATION - BONUS	38,049.51	38,049.51
51625	WORKERS COMP.	6,450.00	6,450.00
51626	401K EXPENSE	9,877.96	9,877.96
51900	STVS	22,439.68	22,439.68
52100	SHOP SUPPLIES	2,160.59	2,160.59
52107	CHEMICALS	15,157.16	15,157.16
52110	SMALL PARTS & EQUIP	1,266.00	1,266.00
52190	LAB EXPENSES	2,641.09	2,641.09
52200	REPAIRS & MAINT.	30,341.55	30,341.55
52201	REPAIRS & MAINT. BUILDING	3,905.54	3,905.54
52202	GROUNDS MAINT. - LAWN/SNOW	15,687.50	15,687.50
52203	CUSTODIAL EXPENSE	8,332.05	8,332.05
52211	EMPLOYEE SUPPLIES	7,528.68	7,528.68
52225	WASTE REMOVAL	1,680.00	1,680.00
52226	ENVIRONMENTAL COSTS	3,494.70	3,494.70
52300	OFFICE SUPPLIES	3,389.60	3,389.60
52310	SMALL OFFICE EQUIPMENT	249.99	249.99



52350	COMPUTER SOFTWARE & HARDWARE	2,500.86		2,500.86
52355	COMPUTER MAINTENANCE	4,520.00		4,520.00
52500	PACKAGING SUPPLIES	115,914.77		115,914.77
52610	FORKLIFT REPAIRS	4,087.50		4,087.50
52700	EXPERIMENTAL & LAB SUPPLIES	268.49		268.49
53100	GAS - UTILITIES	30,563.01		30,563.01
53150	GAS - PROPANE - OTHER	2,816.35		2,816.35
53200	ELECTRICITY	40,240.77		40,240.77
53300	WATER	1,594.63		1,594.63
53400	TELEPHONE	7,200.09		7,200.09
53450	CELL PHONES	59.16		59.16
54210	ADVERT. OTHER	726.50		726.50
54213	ADVERT.PLUMBING	4,230.00		4,230.00
54215	ADVERT. SAMPLES	2,475.91		2,475.91
54310	SEMINAR EXPENSES	259.00		259.00
54400	TRAVEL	2,604.97		2,604.97
54450	MEALS & ENTERTAINMENT	98.31		98.31
54500	BAD DEBT EXPENSE	10,913.40		10,913.40
55000	ADP PAYROLL COSTS	3,502.00		3,502.00
55100	OUTSIDE SVCS. - PROFESSIONAL	16,965.00		16,965.00
55200	OUTSIDE SVCS. - LEGAL	1,827.80		1,827.80
55800	BANK FEES & SERVICE CHGS	6,522.16		6,522.16
57400	EMPLOYEE RELATIONS	5,104.01		5,104.01
57500	POSTAGE	1,375.00		1,375.00
57550	DELIVERY & FUEL CHARGES - OTHER	82.50		82.50
57600	DONATIONS	150.00		150.00
57700	DUES & SUBSCRIPTIONS	2,590.00		2,590.00
58100	DEPRECIATION	110,786.15		110,786.15
58230	EQUIPMENT RENTAL	12,353.69		12,353.69
58300	PROPERTY TAXES	37,645.16		37,645.16
58310	SALES & USE TAXES	5,156.22		5,156.22
58320	OTHER TAXES	1,781.17		1,781.17
58400	INSURANCE	6,157.50		6,157.50
58402	INSURANCE GENERAL	6,660.00		6,660.00
58500	SECURITY SERVICES	5,015.74		5,015.74
58920	CREDIT & COLLECTION FEES	164.00		164.00
58999	MISC. EXPENSE	347.45		347.45
59700	INSIDE COMMISSIONS	8,914.01		8,914.01
59710	OUTSIDE COMMISSIONS	205,348.97		205,348.97
59800	FREIGHT OUT	100,134.27		100,134.27
59810	FREIGHT IN	9,169.20		9,169.20
59950	CORP ALLOCATION	297,457.50		297,457.50
59988	INTER-DIVISION	28,012.50		28,012.50
59999	INTER-DIVISION G&A	20,707.50		20,707.50
91610	RENTAL INCOME	(47,180.63)		(47,180.63)
99050	PROVISION FOR STATE TAX	55,115.81		55,115.81
99200	FEDERAL INCOME TAX	690,167.60	7,098,515.00	7,788,682.60
	Extraordinary income		(22,533,568.00)	(22,533,568.00)
		(1,381,681.93)	(15,435,053.00)	(16,816,734.93)